

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa
Ramirez, Valerie Seyler, and Jannien
Weiner,

Plaintiffs,

v.

Wells Fargo & Co.; Employee Benefit
Review Committee; and Wells Fargo Bank,
National Association; and John and Jane
Does 1-20,

Defendants.

Case No. 0:20-cv-02016-KMM-BRT

**JOINT NOTICE OF CLASS
ACTION SETTLEMENT AND
STIPULATION FOR STAY OF
ALL PROCEEDINGS**

Plaintiffs Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner (collectively, “Plaintiffs”) and Wells Fargo & Company; the Employee Benefit Review Committee; and Wells Fargo Bank, National Association (collectively, “Defendants”), by and through their counsel of record, submit this joint notice to inform the Court of their agreement in principle to settle this action on a class-wide basis. The Parties have agreed to execute a settlement agreement by February 21, 2022; thereafter the Parties will contact chambers to obtain a hearing date for Plaintiffs’ anticipated motion for preliminary approval of the class action settlement and the associated briefing schedule.

Pursuant to the Parties’ agreement in principle, the Parties jointly stipulate and respectfully request a stay of proceedings in this action pending the execution of a written

settlement agreement and preliminary approval. Good cause exists for the Parties' request, and the Parties state the following in support thereof:

This request is made in good faith and is not interposed for improper delay purposes. No Party will be prejudiced by the granting of the requested stay, which is sought in an effort to allow completion of the Parties' settlement. The Parties agree that a stay as set forth in the Proposed Order filed contemporaneously with this Notice and Stipulation would best conserve the Parties' and Court's resources.

The requested stay will affect deadlines in the Third Amended Pretrial Scheduling Order. (Dkt. No. 227.) The Parties agree that all pending deadlines in this litigation should be postponed as part of this requested stay.

THEREFORE, THE PARTIES STIPULATE AND MOVE THIS COURT TO ENTER AN ORDER AS FOLLOWS:

All proceedings in this litigation are stayed pending the execution of a written settlement agreement and preliminary approval of the class action settlement. The Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: January 6, 2022

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